

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Thomas M. Powers	:	Chapter: 7
Debtor(s)	:	
	:	Case Number: 1-08-bk-03596
Thomas M. Powers	:	
Movant(s)	:	Matter: Motion to Redeem
	:	Property As Exempt
vs.	:	
	:	
Mid Penn Bank	:	
Respondent(s)	:	

MOTION TO REDEEM PROPERTY AS EXEMPT

1. Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code on October 1, 2008.
2. At the time of the filing, Debtor claimed as exempt/abandoned personal property his 2006 Chevrolet Impala as well as household goods, in which collateral; Mid Penn Bank is a secured creditor. At the time of the filing, Debtor owed to Mid Penn Bank approximately \$375,000.00.
3. Debtor uses his car primarily for personal, family and household use, and it was claimed as exempt property pursuant to 11 U.S.C. §522. Debtor also exempted household goods that were also secured by Mid Penn Bank.
4. At the time of the filing, the car was in fairly good condition, with approximately 106,000 miles. Based on valuations, it is determined through NADA that the market value of the car was approximately \$7,000.00.
5. Debtor's personal property has been valued by Mid Penn Bank and Kerry Pae, Auctioneer at approximately \$2,500.00.

6. Mid Penn Bank has agreed to allow the Debtor to redeem the vehicle and personal property for \$9,500.00.

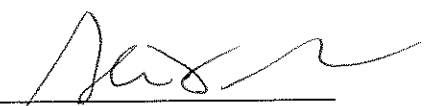
7. Debtor is in a position to redeem the car and personal property for cash from Mid Penn Bank pursuant to 11 U.S.C. § 722.

Wherefore, Debtor respectfully requests that he be allowed to redeem his car and personal property from Mid Penn Bank by paying the sum of \$9,500.00 within 30 days of the entry of such order, or within 30 days of the entry of discharge, whichever occurs first, and that Mid Penn Bank release its secured interest and/or lien, and transfer title to the car, free and clear, to: Thomas M. Powers, Debtor and also to remove its security interest on household goods within 10 days of receipt said funds and a copy of the order herein.

Respectfully Submitted,

Daley Zucker Meilton Miner & Gingrich, LLC

Date: 2/7/12


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